

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

|   |   |                            |
|---|---|----------------------------|
| KIMIESHA HILL, et al., on behalf of themselves) | ) |                            |
| and all others similarly situated,              | ) |                            |
|   | ) | Case No. 5:21-cv-00097-SLP |
| Plaintiffs,                                     | ) |                            |
|   | ) |                            |
| v.  | ) |                            |
|   | ) |                            |
| TOWN OF VALLEY BROOK, et al,                    | ) |                            |
|   | ) |                            |
| Defendants.                                     | ) |                            |
|   | ) |                            |

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**JOINT MOTION TO STAY ALL CASE DEADLINES**

**COME NOW THE PARTIES**, and respectfully request that this Court enter an Order (i) canceling the upcoming Status Conference scheduled for September 26, 2023 at 2:00 pm and (ii) staying all pending case deadlines set forth in the current Amended Scheduling Order, ECF No. 93, for 120 days while the Parties finalize a settlement agreement. In support of this request, the Parties state as follows:

1. On May 24, 2023, the Court issued an Order (ECF No. 93) related to Plaintiffs' Unopposed Motion to Extend Case Deadlines (ECF No. 91). In its Order, the Court recognized that the parties were in the midst of briefing discovery motions related to discovery relevant and necessary for class certification. Accordingly, the Court extended all deadlines, including the deadline for Plaintiffs to file a motion for class certification to on or before September 28, 2023.

2. On July 13, 2023, Defendants, over email correspondence, made a settlement offer to Plaintiffs.

3. On August 1, 2023, the Court issued an Order related to discovery motions, including Plaintiffs' motion to compel and motion for sanctions, and set a Status Conference for August 17, 2023 at 2:00 p.m. to address outstanding issues related to certain aspects of those motions.

4. As reported in the parties' Joint Status Report Regarding Discovery Depositions dated June 16, 2023 (ECF No. 105) the Parties agreed, in relation to Plaintiffs' Motion to Compel and Motion for Sanctions, that Plaintiffs "shall be allowed to depose each Defendant" for "Discovery Depositions." *Id.* at 2.

5. On August 15, 2023, the Parties filed a Joint Motion for an Adjournment of the August 17, 2023 Status Conference (ECF No. 117) because not all of the discovery depositions had occurred as scheduled by that time. The Court granted the motion and adjourned the Status Conference to September 26, 2023 (ECF No. 118).

6. All four discovery depositions have occurred.

7. As further reported in the Parties' Joint Status Report (ECF No. 105), Defendants "agree to pay a set amount, to be agreed upon by the parties, for reasonable fees and costs incurred by Plaintiffs related to the Discovery Depositions, including but not limited to attorneys' fees, travel costs, and court reporter and transcription costs."

8. The Parties have reached an agreement whereby Defendants agree to pay Plaintiffs \$23,000 to cover the reasonable fees and costs reasonable related to the Discovery Depositions in addition to covering all court reporter expenses.

9. The Parties believe that outstanding issues related to Plaintiffs' discovery motions have currently been resolved and accordingly, seek to cancel the Status Conference scheduled for September 26, 2023.

10. On September 13, 2023, Plaintiffs, over email correspondence, accepted Defendants' settlement offer of July 13, 2023.

11. The Parties are working to finalize the agreed-upon settlement.

12. The Parties expect the settlement agreement will obviate the need for a motion seeking class certification and thus, seek to stay existing case deadlines for 120 days.

13. Should the Parties be unable to finalize the settlement agreement within that time period, the Parties expect to, at that time, file a request for a new status conference and will propose an amended case schedule.

14. If the Court would like to preserve the September 26, 2023 Status Conference, the Parties request that the hearing be conducted telephonically.

Respectfully submitted this 22 day of September, 2023.

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